

## ATTACHMENT B. MANAGEMENT POLICIES

The status of the Presidio as a national park creates public expectation for consistency with the NPS Management Policies. A review of NPS Management Policies indicates several areas of inconsistency with those policies, as noted below.

### Cultural Resource Management

*Section 1.4.5: “The impairment that is prohibited by the Organic Act and the General Authorities Act is an impact that, in the professional judgement of the responsible NPS manager, would harm the integrity of park resources or values. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:*

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;*
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or*
- Identified as a goal in the park’s general management plan or other relevant NPS planning documents.”*

*Section 5.2 – Planning. “Planning decisions will follow analysis of how proposals might affect the values that make resources significant, and the consideration of alternatives that might avoid or mitigate potential adverse effects. Planning will always seek to avoid harm to cultural resources, and consider the values of traditionally associated groups. To ensure that approaches and alternatives for resource preservation have been identified and considered, planning processes that could affect cultural resources must include cultural resource specialists, traditionally associated peoples...”*

*Section 5.3.5.4.7-Use of Historic Structures – “NHPA also requires each agency to implement alternatives to the adaptive use of historic properties it owns, if that will help ensure the properties’ preservation. Therefore, compatible uses for structures will be found whenever possible.”*

*Section 9.1.1.3-Protection of Cultural Values – “When important cultural resources are present, efforts will be made to utilize existing contributing structures.”*

*Section 9.1.1.4 -Adaptive Use – “ The National Historic Preservation Act and Executive Order 13006 require that each federal agency – prior to acquiring, constructing or leasing buildings – to use, to the maximum extent feasible, historic properties available to it, whenever operationally appropriate and economically prudent (16 USC 470h-2(a)(1))...Even when the cost of adaptive use is greater than new construction, it may still be justified.”*

The Presidio of San Francisco has been evaluated as required and it has been determined to be nationally significant. It was designated a National Historic Landmark in 1966 and the nomination was updated in October 1993. The update contains an extensive inventory of contributing and non-contributing resources. Since the PTIP has not identified the cultural resources to be removed or affected, the impact of the plan on the National Historic Landmark District (NHLD) cannot be adequately evaluated. The cumulative effect of boundary erosion or the continued removal of contributing structures could each constitute an unmitigatable adverse effect on the NHLD.

NPS, as well as other federal agencies, is required to make every effort to use existing contributing structures rather than propose new construction. If new construction is to be considered, it cannot be an intrusion on significant cultural or natural resources. The PTIP does not clearly state whether all historic structures have been adequately used to ensure their preservation nor does the plan provide information on the location of new construction to determine whether it will affect either natural or cultural resources.

In addition, the PTIP calls for completing the study of economic feasibility of rehabilitation based on the 1985 HABS report. Rather than reuse historic structures, the Presidio Trust is assuming removal of structures that don't meet their undisclosed financial feasibility criteria and using the square footage to construct new structures.

If there is the possibility of impairment, it is the policy of the NPS to "...take appropriate action, to the extent possible within the Service's authorities and available resources, to eliminate the impairment." The PTIP does not use planning to avoid the effects on the National Historic Landmark District. When considering general plans or a proposed project, the NPS must evaluate the action under NEPA and make a specific determination in writing stating that, "the activity will not lead to an impairment of park resources and values. If there would be an impairment, the action may not be approved."

Finally, traditionally associated peoples must be consulted during the planning process to ensure that their values are considered during the planning process. The NPS encourages full and ongoing consultation with the Ohlone people as part of the continuing PTIP planning process.

#### Natural Resource Management

*Section 4.4.1. General Principles for Managing Biological Resources - "The National Park Service will maintain as parts of the natural ecosystems of parks all native plants and animals...The Service will achieve this maintenance by: minimizing human impacts on native plants, animals, populations, communities, and ecosystems, and the processes that sustain them."*

There are two proposed changes to the GMPA in the Public Health Services Hospital District (PHSH) with respect to land use zoning that would have important, detrimental impacts to natural resources (PTIP p. 113).

- 1) The parking area north of the PHSH is changed from a native habitat restoration area to landscape vegetation.
- 2) The Nike Missile swale is changed from native habitat restoration area to institutional/residential use.

In the DEIS, the impacts of these changes are well documented: page S-13, "a greater potential for disrupting wildlife movement particularly in the PHSH Planning District." ; page 254, "Possible effects on these resources could include increased threat of invasive non-native plant species, and the introduction of structures that would obstruct wind fetch from Baker Beach (necessary for viable San Francisco lessingia habitat), as well as potential reduction in annual plant species richness and available habitat for San Francisco lessingia."; page 262, "effects could include a change in the existing hydrology of this existing wetland". This lost opportunity for planned expansion of wetlands and habitat for an endangered species is a serious concern to the National Park Service.

*Section 4.6.5 "When natural wetland characteristics or functions have been degraded or lost due to previous or on-going human actions, the Service will, to the extent practicable, restore them to predisturbance conditions."*

*Section 4.6.6 "The Service will manage watersheds as complete hydrologic systems..."*

During the PTIP planning process, the NPS requested that the Trust identify and protect from development an expansion area for the Crissy Marsh sufficient to ensure a fully functioning natural system, and provide a clear commitment that the Tennessee Hollow riparian corridors and the Crissy Marsh system will be planned comprehensively and restored as a complete, connected and functional natural ecosystem. These are goals that are consistent with the PTIP Planning Principles # 1 and 3. The PTIP does not include this clear commitment, and could allow long term leases of existing structures, or other uses, to significantly constrain marsh expansion.

The PTIP does not provide an analysis of increase or decrease in stormwater runoff, volume, and quality concerns, to adequately ensure protection of Area A.

While open space may appear to increase under the proposed plan, the intensity of development throughout area B will have overall watershed effects that need to be addressed to protect park resources and values.

#### Interpretation Management Policies

*Section 8.2, "...The Service is committed to providing appropriate, high quality opportunities ...that (are) open, inviting, and accessible to every segment of American society."*

Should the ultimate mix of tenants contain a predominance of private business tenants, this could have the effect of making the Presidio less open, inviting and accessible to the general public.

#### Visitor Carrying Capacity

*Section 8.2.1: The general management planning process will determine the desired resource and visitor experience conditions that are the foundation for carrying capacity analysis and decision making.*

The DEIS should more completely analyze the impact of significantly increased visitation envisioned in the alternatives. From the 3.7 million visitors of the GMPA, the level of recreational visitation in the alternatives goes as high as 8.4 million visitors per year (DEIS p. S-18). Since annual visitation for all of San Francisco is 17.3 million, these numbers imply a level of use in the Presidio that would have a noticeable effect on the desired resource and visitor experience conditions, altering the quality of respite for which a national park, adjacent to an urban area, would be valued.

#### Visitor Facilities

*Section 9.3.2: In general, they should be provided only when the private sector or other public agencies cannot adequately provide them in the park vicinity. However, in-park facilities or services may be justified ... when leaving the park to obtain incidental services would substantially detract from the quality of the visitor experience.*

*Section 9.3.1.7 ...Permanent facilities may be built specifically for cultural activities only when all of the following criteria are met:*

- *The permanent facility is required for programs of major importance in conveying the park story;*
- *It would be impossible or impractical to use demountable or temporary facilities;*
- *It would be impossible to adaptively use other park facilities;*
- *Neither the facility nor its operation would impair cultural or natural resources, or hinder the use of the park for its intended purpose; and*
- *It would not be feasible for others outside the park to provide the facility.*

The consideration of cultural programs is an important element of the effort to bring the Presidio alive, however, the addition of new construction to meet these needs should be carefully weighed against the preservation of the important resources of the Presidio, both natural and cultural. A final consideration would be the clear connection of any proposed facilities to the mission of the park.